

## Department of Water and Power



the City of Los Angeles

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NORMAN J. POWERS, *Chief Financial Officer*

April 13, 1993

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Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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Dear Ms. Searcy:

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ET Docket No. 92-9

Pursuant to Section 1.429(g) of the Commission's Rules, the Los Angeles Department of Water and Power (Department) hereby respectfully submits the following "Reply Comments" in response to the Comments filed in opposition to the "Petitions for Reconsideration and/or Clarification" filed by the American Public Power Association (APPA) and the Utilities Telecommunications Council (UTC) with respect to the First Report and Order (First R & O), FCC 92-437, released October 16, 1992, in the above captioned matter.

The Department is the largest United States municipal utility and serves a population of more than 3.5 million people within the boundaries of the City of Los Angeles.

The Department maintains an extensive private microwave system and depends upon it to monitor and control the flows of water and electric power, to detect and isolate power faults before they cause power interruptions to the public, and to provide critical communication links with other utilities. A number of the Department's microwave links currently utilize the 1850-2200 MHz band.

The Department agrees with APPA and UTC that the FCC must clarify/amend rules on exemption of 2 GHz licensees to include all state and local government licensees.

The Department and other public power agencies as well as state and local government agencies will face special economic and operational considerations in relocating their 2 GHz fixed microwave operations. The Department depends heavily on its microwave communications, and any disruption or interference cannot be tolerated.

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April 13, 1993

The Department again reiterates its support for the APPA and UTC petitions to clarify that the exception for state and local governments applies to all state and local government agencies, including public power agencies.

The Department respectfully requests the Commission to consider these "Reply Comments" in acting on the subject "Petitions for Clarification and/or Reconsideration".

If you have any questions or require additional information, please contact me at (213) 481-6780.

Sincerely,

A handwritten signature in cursive script, reading "Paul R. Shockley / glr".

PAUL R. SHOCKLEY  
Manager of Telecommunications

c: See Enclosed CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I, Paul R. Shockley, Manager of Telecommunications, with the Los Angeles Department of Water and Power, hereby certify that a copy of the foregoing Reply Comments was mailed postage-paid, this 14th day of April, 1993, to each of the following:

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